

Rheo A. Brouillard

President &
Chief Executive Officer

March 20, 2006

Regulation Comments Chief Counsel's Office Office of Thrift Supervision 1700 G Street, N.W. Washington, D.C. 20552

RE: OTS Docket No. 2006-05

Dear Sir/Madam:

In 2004 Savings Institute Financial Group, Inc. was formed as the mid-tier holding company of SI Bancorp, MHC, owning shares of Savings Institute Bank & Trust Company. The by-laws of the Company, the MHC and the Bank incorporate the director integrity language as then authorized by the Office of Thrift Supervision (OTS). The Directors of the Company believe that directors must be persons of integrity and therefore support the proposed rulemaking concerning the pre-approved director integrity by-law.

As fiduciaries, directors occupy a very visible position of trust in the eyes of depositors, employees and shareholders. Maintaining that sacred trust, important in any industry, is an especially integral part of minimizing reputation risk within an individual institution, indeed within the entire financial services industry. What's more, director integrity should be judged in light of dishonesty or breach of trust regardless of the industry or nature of the acts committed. Consideration should also be given to protect the industry from related parties to those otherwise banned who would act on their behalf.

The lessons of Enron and other corporate scandals which led to the passage of the Sarbanes-Oxley Act of 2002 serve to reinforce the need for ethical behavior, in particular, at the highest level of corporate governance. The proposed by-law is a good example of "best practices" and one more tool available to those companies that wish to use it within their corporate governance policies.

As evidenced by our Company's pending application to adopt a version of the by-law in question, we encourage the OTS make this added protection available to all federal savings associations. Thank you for your consideration. Feel free to contact me if you require any additional information.

Rheo A. Brouillard

President & CEO